

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

|  |   |                    |
|--|---|--------------------|
| AMEREN TRANSMISSION COMPANY OF ILLINOIS                  | ) |                    |
|  | ) |                    |
| Petition for a Certificate of Public Convenience and     | ) |                    |
| Necessity, pursuant to Section 8-406.1 of the Illinois   | ) |                    |
| Public Utilities Act, and an Order pursuant to Section   | ) |                    |
| 8-503 of the Public Utilities Act, to Construct, Operate | ) |                    |
| and Maintain a New High Voltage Electric Service         | ) | Docket No. 12-0598 |
| Line and Related Facilities in the Counties of Adams,    | ) |                    |
| Brown, Cass, Champaign, Christian, Clark, Coles,         | ) |                    |
| Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie,      | ) |                    |
| Pike, Sangamon, Schuyler, Scott and Shelby, Illinois.    | ) |                    |

**AMEREN TRANSMISSION COMPANY OF ILLINOIS’ RESPONSE TO ADAMS  
COUNTY PROPERTY OWNERS AND TENANT FARMERS’ MOTION TO AMEND  
THE CASE MANAGEMENT PLAN TO EITHER ELIMINATE THE DECEMBER 31,  
2012 FILING REQUIREMENT OR TO EXTEND THE TIME FOR THE SAME.**

Ameren Transmission Company of Illinois (ATXI) hereby submits this response to intervenor Adams County Property Owners and Tenant Farmers’ (ACPO) December 28, 2012 motion to extend or eliminate the December 31, 2012 deadline for Staff and Intervenor to identify alternate routes, as provided for in the Case Management Order (CMO) entered by the ALJs on December 14, 2012.

The case schedule in this proceeding has been thoroughly briefed and reaffirmed by the ALJs. The deadline ACPO seeks to challenge in its Motion has passed, and numerous parties, including the ACPO itself, have submitted alternative route proposals. Now that a deadline for that filing has been established and passed, it cannot be altered. Indeed, the ALJs have rejected a virtually identical motion for extension of time. For this reason, and those enumerated below, the ACPO’s motion should be denied.

The ACPO “adopts and joins” the arguments set forth in a similar motion filed by Stop the Power Lines Coalition (the “Coalition”). (ACPO Motion, ¶ 2.) This Motion has been

denied. The ALJs denied the Coalition's motion because the "statutory deadline does not permit the time to address the movant's concerns." (Notice of ALJ Ruling (Dec. 31, 2012).) The ACPO has merely reiterated the Coalition's arguments and has offered no new evidence in support of the Coalition's contentions. Since these issues have already been ruled upon, they must be rejected again now.

Moreover, although the ACPO has complained of the difficulty it has encountered in identifying alternate routes and property owners, its concerns are belied by the fact that no less than thirteen other parties have already identified alternate routes and affected landowners. Even the ACPO was able to submit an alternate route proposal and a list of affected landowners. (Adams County Property Owners, Sub. of Alt. Route (Dec. 31, 2012).) Therefore, their concerns are moot and should be rejected.

The ACPO also claims that the expedited procedure permitted by Section 8-406.1 of the Public Utilities Act, 220 ILCS 5/8-406.1, "does not allow for a meaningful proceeding," and is "fundamentally flawed." (ACPO Motion ¶ 8.) This allegation is misplaced. Here, the ACPO ignores the fact that, in furtherance of the expedited process, ATXI held nearly 100 open houses inviting interested stakeholders and affected property owners to review its proposed routes and to raise any concerns. Further, under the expedited process, ATXI was obligated to provide, and did provide, a great volume of information related to its proposed routes in conjunction with its application. But for the expedited process, this information would have been available to ACPO and other intervenors only through discovery, which may have taken weeks or even months. Finally, ATXI agreed to extend the length of this proceeding, as permitted by Section 8-406.1, resulting in a due date for the Commission's order over seven months after ATXI's application

was filed. In sum, the requirements of Section 8-406.1 – with which ATXI has fully complied – ensure a “meaningful proceeding,” despite the ACPO’s unsupported contention to the contrary.

WHEREFORE, for all the reasons stated above, the ACPO’s December 28, 2012 motion to amend the case schedule in this proceeding should be denied

Dated: January 11, 2013

Respectfully submitted,

Ameren Transmission Company of Illinois

/s/ Albert D. Sturtevant

One of their Attorneys

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**CERTIFICATE OF SERVICE**

I, Albert D. Sturtevant, an attorney, certify that on January 11, 2013, I caused a copy of the foregoing *Ameren Transmission Company of Illinois' Response to Adams County Property Owners and Tenant Farmers' Motion to Amend the Case Management Plan to Either Eliminate the December 31, 2012 Filing Requirement or Extend the Time for the Same* to be served by electronic mail to the individuals on the Commission's Service List for Docket 12-0598.

/s/ Albert D. Sturtevant  
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